

Gregory H. Guillot, Admitted *pro hac vice*
ggmark@radix.net

GREGORY H. GUILLOT, P.C.
13455 Noel Road, Suite 1000
Dallas, TX 75240
Phone: (972) 774-4560
Fax: (214) 515-0411

John L. Krieger, Nevada Bar No. 6023
JKrieger@LRLaw.com
LEWIS AND ROCA LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Phone: (702) 949-8200
Fax: (702) 949-8389

George L. Paul, Admitted *pro hac vice*
GPaul@LRLaw.com
Robert H. McKirgan, Admitted *pro hac vice*
RMckirgan@LRLaw.com
LEWIS AND ROCA LLP
40 North Central Avenue, Suite 1900
Phoenix, AZ 85004
Phone: (602) 262-5326
Fax: (602) 734-3857

Attorneys for Plaintiff,
DONNA CORBELLO

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONNA CORBELLO, an individual,

Plaintiff,

vs.

THOMAS GAETANO DEVITO, an individual,
et al.,

Defendants.

Case No. 2:08-cv-00867-RCJ-PAL

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE
REPLY BRIEF REGARDING CROSS
MOTION FOR PROTECTIVE ORDER
(DOC. 426)**

(First Request)

1 Plaintiff Donna Corbello, by her attorneys and pursuant to LR 6-1 and 7-1, hereby moves
 2 the Court for entry of the attached *Order*, extending the deadline for Plaintiff's Reply brief re her
 3 Motion for Protective Order (Doc 426) to Monday, March 14, 2011. Whereas Plaintiff's Reply
 4 brief is currently due on Wednesday, March 9, 2011, the extension would continue this deadline
 5 for three additional business days. This is Plaintiff's first request for an extension of time.
 6 Defendants have advised Plaintiff they do not oppose this Motion.

7 Good cause exists for grant of the requested extension. Other work in the case has been
 8 unexpectedly time consuming. As only one example, Plaintiff's counsel have been busy trying
 9 to finalize a comprehensive scheduling order in this action, which necessitates phone
 10 conversations with opposing counsel, email correspondence, and the serial redrafting of
 11 proposed orders. For all these reasons, Plaintiff's counsel submits that an extension is necessary.
 12 Plaintiff submits that this extension will not prejudice Defendants, who do not oppose the
 13 Motion in any event. This extension is not requested for any improper purpose or delay.


14 IN VIEW OF THE ABOVE, Plaintiff respectfully requests entry of the attached *Order*,
 15 indicating that she may file and serve her Reply brief on or by March 14, 2011.

16 DATED: March 9, 2011.

17 By: /s/George L. Paul
 18 John L. Krieger (Nevada Bar No. 6023)
 19 Gregory H. Guillot (*Admitted Pro Hac Vice*)
 20 George L. Paul (*Admitted Pro Hac Vice*)
 21 Robert H. McKirgan (*Admitted Pro Hac Vice*)

22 Attorneys for Plaintiff, Donna Corbello

23 IT IS SO ORDERED:

24 
 25 UNITED STATES DISTRICT JUDGE
 26 DATED: March 14, 2011

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I, Gregory H. Guillot, certify that on this, the 7th day of January, 2011, I caused the document entitled PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF REGARDING MOTION FOR RECONSIDERATION (First Request) to be served as follows:

[] by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or

[] Pursuant to Fed. R. Civ. P. 5(b)(2)(D), to be sent via facsimile;

[] to be hand-delivered; and/or

[X] by U.S. District Court ECF electronic transmission to the attorneys of record.

L. Bradley Hancock
Christopher B. Payne
Greenberg Traurig, LLP
1000 Louisiana
Suite 1800
Houston, TX 77002

Booker T. Evans, Jr.
Greenburg Traurig, LLP
2375 East Camelback Road
Suite 700
Phoenix, AZ 85016

*Attorneys for
Thomas Gaetano DeVito*

Daniel M. Mayeda
LEOPOLD, PETRICH & SMITH, P.C.
2049 Century Park East, Suite 3110
Los Angeles, CA 90067-3274

David S. Korzenik
MILLER KORZENIK SOMMERS LLP
488 Madison Avenue, Suite 1120
New York, NY 10022-5702

Samuel S. Lionel
Todd Kennedy
LIONEL, SAWYER & COLLINS
300 So. 4th Street #1700
Las Vegas, NV 89101

*Attorneys for Defendants Frankie Valli,
Robert J. Gaudio, Marshall Brickman, Eric
S. Elice, Des McAnuff, DSHT, Inc., and
Dodger Theatricals, Ltd.*

Dated this 9th day of March, 2011.

/s/Gregory H. Guillot
Gregory H. Guillot